

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GREAT AMERICAN INSURANCE)
COMPANY OF NEW YORK,)
Plaintiff,)
v.)
KELLAWAY WAREHOUSE SERVICES,)
MANCHESTER MOTOR FREIGHT,)
CONSOLIDATED RAIL CORP., and)
ROUND THE WORLD LOGISTICS,)
Defendants.)

CIVIL
OFFICE
Civil Action No.: 04-11968-MEL
4/27/05 D: 41
HONORABLE COURT
CLASS

PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT AS TO DEFENDANT,
KELLAWAY WAREHOUSE SERVICES

NOW COMES the Plaintiff, Great American Insurance Company of New York, by and through its undersigned attorneys, HOLBROOK & MURPHY, and moves that this Honorable Court enter a default against the Defendant Kellaway Warehouse Services for failing to answer or otherwise file a response to Plaintiff's complaint.

As reason therefor, Plaintiff states that service was made on Kellaway Warehouse Services, and there has been no answer or response to Plaintiff's complaint submitted by the Defendant Kellaway

WHEREFORE, Plaintiff prays that a default issue against the Defendant Kellaway Warehouse Services

By its attorney,

Seth S. Holbrook

Seth S. Holbrook
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by mail (by hand) on 4-26-05

Seth S. Holbrook